

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WILFREDO LOPEZ,

Plaintiffs,

v.

Civil Action No.: 1:13-cv-04759-RJD-SMG

**ALLIED AVIATION SERVICE
COMPANY OF NEW YORK, INC.,
ALLIED AVIATION HOLDINGS
CORPORATION, and
ROBERT L. ROSE, Individually,**

Defendants.

**DEFENDANTS' SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING TO PLAINTIFFS' COLLECTIVE ACTION
COMPLAINT**

Defendants, ALLIED AVIATION SERVICE COMPANY OF NEW YORK, INC., ALLIED AVIATION HOLDINGS CORPORATION, and ROBERT L. ROSE, Individually, by and through their undersigned counsel and pursuant to Rule 7.1 of the Rules of the United States District Court for the Eastern District of New York, and submits this Second Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint, and as grounds therefore states:

1. On September 3, 2013, Defendants were served with the Collective Action Complaint (D.1) in the above-captioned action.
2. On September 25, 2013, Defendants filed their Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint (D.5).

3. On September 25, 2013, the Court entered an Order granting Defendants' Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint.
4. Defendants are requesting a further 14 day extension of time to file a responsive pleading.
5. The reason for this second request for an extension of time is because the attorneys for the Plaintiffs and the Defendants have had numerous communications concerning potential settlement, tolling, consolidation, and the filing of an amended complaint(s), as well as other procedural issues which would be economically beneficial for the parties and which would avoid needless judicial intervention.
6. The undersigned counsel has conferred with Plaintiffs' counsel, who is in agreement with Defendants' request for a 14 day extension of time to file a responsive pleading.
7. Consequently, Defendants requests an extension of time until October 23, 2013 to file a responsive pleading to Plaintiffs' Collective Action Complaint.

DATED this 8th day of October, 2013.

Respectfully submitted,

/s/ Donna M. Griffin

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TRIAL COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2013, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which electronically notifies Jodi J. Jaffe, Esq., Jaffe Glenn Law Group, P.A., 12000 Biscayne Boulevard, Suite 305, N. Miami FL 33181 of such filing.

/s/ Donna M. Griffin